

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ROBYN KRAVITZ, et al.

Plaintiffs,

v.

U.S. DEPARTMENT OF COMMERCE, *et al.*,

Defendants.

Civil Action No. 8:18-cv-01041-GJH

Hon. George J. Hazel

LA UNIÓN DEL PUEBLO ENTERO; *et al.*

Plaintiffs,

v.

WILBUR L. ROSS, sued in his official
capacity as U.S. Secretary of Commerce; *et al.*

Defendants.

Civil Action No. 8:18-cv-01570-GJH

Hon. George J. Hazel

**PLAINTIFFS' MOTION FOR EXPEDITED BRIEFING SCHEDULE ON EMERGENCY
MOTION FOR A PRELIMINARY INJUNCTION AND INJUNCTION PENDING
APPEAL**

Plaintiffs have moved for an injunction preventing Defendants from adding a citizenship question to the 2020 Census forms pending this Court and the Fourth Circuit's final review of Plaintiffs' equal protection and Section 1985 claims.

Plaintiffs hereby move pursuant to Federal Rules of Civil Procedure 6(c)(1)(C), Local Civil Rule 105(2)(a), and the Court's inherent power to manage its docket, for an order requiring Defendants to respond to Plaintiffs' motion on June 27, 2019. Plaintiffs also respectfully request the Court to rule on Plaintiffs' preliminary injunction motion by June 28.

An expedited schedule is necessary and in the interest of justice based on the urgency of the issues and the importance of the decennial Census to the public interest. The facts and procedural history of this case are well known to the parties and the Court. Of particular relevance to Plaintiffs' request, Defendants have indicated that they will proceed with printing the census form with the citizenship question should the Supreme Court vacate the injunction in *Department of Commerce v. State of New York*, No. 18-966 and *Ross v. State of California*, No. 18-1214.¹ See June 18 Hr'g Tr. at 106. Defendants' intention of printing census forms while the courts are still considering the equal protection and § 1985 claims, in an effort to moot and thereby prevent the judiciary from ruling on the merits of the claims, would irreparably harm Plaintiffs.

In contrast, a shortened briefing schedule would not harm Defendants. Given their stated intent to rapidly finalize the census questionnaire following the Supreme Court's decision tomorrow, they would not be prejudiced by an expedited resolution of Plaintiffs' motion.

For the foregoing reasons, Plaintiffs respectfully request that this Court issue an order requiring Defendants to respond to Plaintiffs' motion on June 27, and respectfully request that the Court rule on the motion by June 28.

Dated: June 26, 2019

Respectfully Submitted,

/s/ Daniel Grant (Bar. No. 19659)

/s/ Denise Hulett

¹ Defendants have filed a petition for writ of certiorari in the *California* case, which is currently pending before the Supreme Court.

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CERTIFICATE OF SERVICE

I certify that on this 26th day of June 2019, I caused a copy of the foregoing document and all accompanying filings to be sent to all parties receiving CM/ECF notices in this case.

By: /s/ Daniel Grant

Daniel T. Grant